

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION

WALTON TENNESSEE, LLC, *et al.*, )  
  )  
Plaintiffs,                         )  
  )  
v.                                     ) Civil Action No. 3:24-cv-01308  
  )  
JONATHAN SKRMETTI, in his official ) District Judge Eli J. Richardson  
capacity as the Tennessee Attorney ) Magistrate Judge Barbara D. Holmes  
General & Reporter, *et al.*,      )  
  )  
Defendants.                         )

---

**NOTICE OF VOLUNTARY DISMISSAL**

---

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(i), Plaintiffs Walton Tennessee, LLC (“Walton Tennessee”); Stephen Misch, individually and as beneficiary and trustee of the Misch, Stephen John Burrus Ridge Revocable Trust; Jason Vance, individually and as beneficiary and trustee of the Vance, Jason Floyd Burrus Ridge Revocable Trust and as beneficiary and trustee of the Vance, Jason Floyd Cane Ridge Landing Revocable Trust; and Alessandro Silvestroni, individually and as beneficiary and trustee of the Silvestroni, Alessandro Burrus Ridge Revocable Trust and as beneficiary and trustee of the Silvestroni, Alessandro Cane Ridge Landing Revocable Trust, hereby submit this Notice of Voluntary Dismissal of this action.

Defendants have made clear to Plaintiffs and this Court that Public Chapter 995 of the Tennessee Public Acts of 2024 (the “Act”) does not apply to land interests acquired before January 1, 2025, by the Plaintiffs and Walton Tennessee’s principals. Defendants have stated unambiguously that “the divestment, escheatment, and criminal provisions of the Act do not apply to land holdings acquired by [Plaintiffs and Walton Tennessee’s principals] before January 1,

2025,” Dkt. 31 at 14, because these provisions of the Act “appl[y] prospectively,” *id.* at 42. Defendants concluded that “[f]or [Plaintiffs and Walton Tennessee’s principals] holding interests in land that w[as] acquired before January 1, 2025, there is no threat of escheatment to the State under the Act.” *Id.* at 30.

Defendants have not served an answer or a motion for summary judgment in this action. *See* Fed. R. Civ. P. 41(a)(1)(A)(i). Under Rule 41, this dismissal is without prejudice. *See id.* 41(a)(1)(B). Plaintiffs reserve the right to renew this action if Defendants attempt to enforce the Act against Plaintiffs, including Walton Tennessee and its principals.

Dated: December 31, 2024

Respectfully submitted,

/s/ Connor M. Blair

Van P. East, III  
Connor M. Blair  
Timothy A. Rodriguez  
Bradley Arant Boult Cummings LLP  
1221 Broadway, Suite 2400  
Nashville, Tennessee 37203  
Telephone: (615) 252-3887  
Facsimile: (615) 252-6348  
veast@bradley.com  
cblair@bradley.com  
trodriguez@bradley.com

John Parker Sweeney (*pro hac vice*)  
Bradley Arant Boult Cummings LLP  
1615 L Street N.W., Suite 1350  
Washington, D.C. 20036  
Telephone: (202) 719-8216  
Facsimile: (202) 719-8316  
jsweeney@bradley.com

*Counsel for Plaintiffs*

## CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on December 31, 2024, a true and correct copy of the foregoing has been served on counsel below for all Defendants through operation of the Court's electronic filing system and, by agreement with counsel for Defendants, email:

Tyler Sanders (#36189)  
Assistant Attorney General  
Financial Division  
P.O. Box 20207  
Nashville, Tennessee 37202  
Tyler.Sanders@ag.tn.gov  
Telephone: (615) 313-5789

*Counsel for Defendants*

/s/ Connor M. Blair  
Connor M. Blair